

UNITED STATES DISTRICT COURT

United States Courts  
Southern District of Texas  
FILED

SOUTHERN DISTRICT OF TEXAS

SEP 22 2010

CORPUS CHRISTI DIVISION

David J. Bradley, Clerk of Court

UNITED STATES OF AMERICA

v.

KIMBERLEE BARTER  
JEREMIAH LARRIVEE

§  
§  
§  
§  
§  
§

CRIMINAL NUMBER

**C-10-914**

INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT ONE

From on or about August 4, 2010, to on or about September 4, 2010, in the Corpus Christi Division of the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

KIMBERLEE BARTER  
and JEREMIAH LARRIVEE,

did knowingly and intentionally conspire and agree together, with each other, and with other persons known and unknown to the Grand Jury, to traffic in or use in and affecting interstate or foreign commerce, one or more unauthorized access devices with the intent to defraud. This violation involved things having an aggregate value of one thousand dollars (\$1,000.00) or more during a one-year period, to wit: KIMBERLEE BARTER and JEREMIAH LARRIVEE, each aiding, abetting, and assisting one another, used unauthorized access devices to receive things in the total amount and value of thirty-seven thousand nine hundred seventeen dollars and eighty-three cents (\$37,917.83).

In violation of Title 18, United States Code, Sections 371, 1029(a)(2), and 1029(b)(2).

COUNT TWO

From on or about August 4, 2010, to on or about September 4, 2010, in the Corpus Christi Division of the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

KIMBERLEE BARTER  
and JEREMIAH LARRIVEE,

did knowingly and with intent to defraud, use in and affecting interstate and foreign commerce, one or more unauthorized access devices in order to receive a thing or things having an aggregate value of one thousand dollars (\$1,000.00) or more during a one-year period, to wit:

KIMBERLEE BARTER and JEREMIAH LARRIVEE, each aiding, abetting, and assisting one another, used unauthorized access devices to receive things in the total amount and value of thirty-seven thousand nine hundred seventeen dollars and eighty-three cents (\$37,917.83).

In violation of Title 18, United States Code, Section 1029(a)(2).

COUNT THREE

From on or about August 4, 2010, to on or about September 4, 2010, in the Corpus Christi Division of the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendant,

KIMBERLEE BARTER,

did knowingly transfer, possess, and use, without lawful authority, a means of identification of another, to wit: the name of S. D., during and in relation to a felony violation of Title 18, United States Code, Section 1029(a)(2).

In violation of Title 18, United States Code, Section 1028A.

COUNT FOUR

From on or about August 4, 2010, to on or about September 4, 2010, in the Corpus Christi Division of the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendant,

KIMBERLEE BARTER,

did knowingly transfer, possess, and use, without lawful authority, a means of identification of another, to wit: the name of J. A., during and in relation to a felony violation of Title 18, United States Code, Section 1029(a)(2).

In violation of Title 18, United States Code, Section 1028A.

COUNT FIVE

From on or about August 4, 2010, to on or about September 4, 2010, in the Corpus Christi Division of the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendant,

KIMBERLEE BARTER,

did knowingly transfer, possess, and use, without lawful authority, a means of identification of another, to wit: the name of R.F., during and in relation to a felony violation of Title 18, United States Code, Section 1029(a)(2).

In violation of Title 18, United States Code, Section 1028A.

A TRUE BILL:  
ORIGINAL SIGNATURE ON FILE  
FOREPERSON OF THE GRAND JURY

JOSE ANGEL MORENO  
UNITED STATES ATTORNEY

By:

  
\_\_\_\_\_  
ROBERT D. THORPE, JR.  
Assistant United States Attorney